

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Counsel to the Official Committee of Unsecured Creditors

In re:

ALUMINUM SHAPES, L.L.C.,

Debtor.

Chapter 11

Case No. 21-16520-JNP

ALUMINUM SHAPES, L.L.C.,

Plaintiff,

v.

EULER HERMES NORTH AMERICA
INSURANCE CO., subrogee of NORTHEAST
METAL TRADERS, INC.,

Adv. Pro. No. 21-01469-JNP

Hearing Date: May 24, 2022

Hearing time: 11:00 am

Defendant.

NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR AN ORDER APPROVING THE SETTLEMENT BY AND BETWEEN THE COMMITTEE AND EULER HERMES

PLEASE TAKE NOTICE that on **May 24, 2022 at 11:00 am** (Eastern Time), or as soon thereafter as counsel may be heard, the Official Committee of Unsecured Creditors (the “**Committee**”), by and through its undersigned counsel, shall move (the “**Motion**”) before the Honorable Jerrold N. Poslusny, United States Bankruptcy Judge, in Courtroom 4C of the United States Bankruptcy Court for the District of New Jersey, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, Camden, New Jersey 08101, for entry of an order, substantially in the form submitted herewith, approving the settlement by and between the Committee and Euler Hermes.

PLEASE TAKE FURTHER NOTICE that the Committee shall rely upon the Motion filed herewith. No brief is necessary as no novel issues of fact or law are presented by the Motion. A proposed form of order was also submitted therewith. Oral argument is requested in the event an objection is timely filed.

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed with the Clerk of the Court together with proof of service thereof, and served so as to be actually received by no later than **May 17, 2022 at 4:00 pm** (Eastern Time) by counsel to the Committee, FOX ROTHSCHILD LLP, 49 Market Street, Morristown, New Jersey 07960-5122, Attn: Joseph J. DiPasquale, Esq. (JDIPasquale@FoxRothschild.com).

PLEASE TAKE FURTHER NOTICE that objections to the Motion, if any, must: (a) be in writing; (b) comply with the Bankruptcy Rules, the Local Rules of the United States Bankruptcy Court for the District of New Jersey, and any other case management rules or orders of this Court; and (c) state with particularity the legal and factual basis for the objection.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served in accordance with this notice, it may not be considered by the Bankruptcy Court. In the event no objections are filed, the relief requested in the Motion may be granted without a hearing.

Dated: April 20, 2022

Respectfully submitted,

FOX ROTHSCHILD, LLP

/s/ Joseph J. DiPasquale

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